

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA**  
Alexandria Division

<b>UNITED STATES OF AMERICA,</b>	:	
	:	
<b>v.</b>	:	<b>Criminal Case No. 1:18-CR-457 (AJT)</b>
	:	
<b>BIJAN RAFIEKIAN</b>	:	
	:	
<b>and</b>	:	
	:	
<b>KAMIL EKIM ALPTEKIN,</b>	:	
	:	
<b>Defendants.</b>	:	

**DEFENDANT BIJAN RAFIEKIAN'S EMERGENCY MOTION  
FOR LEAVE TO REMOVE AND REPLACE EXHIBIT A  
OF THE MEMORANDUM IN SUPPORT OF HIS MOTION TO COMPEL**

Defendant, through counsel, respectfully requests that the Court withdraw Exhibit A attached to Mr. Rafiekian's Memorandum in Support of His Motion to Compel and substitute it with the Exhibit A attached to this motion.

The exhibit contains personal identifying information and should be replaced to protect the parties' privacy. Defendant has attached hereto a redacted version of the relevant exhibit.

WHEREFORE, Defendant respectfully requests that the Court remove and replace the exhibit identified above.

Dated: March 4, 2019

Respectfully submitted,

/s/  
Mark J. MacDougall (*Pro Hac Vice*)  
Stacey H. Mitchell (*Pro Hac Vice*)  
*Counsel for Bijan Rafiekian*  
Akin Gump Strauss Hauer & Feld LLP  
1333 New Hampshire Avenue, NW  
Washington, DC 20036  
Telephone: (202) 887-4000

Fax: (202) 887-4288

E-mail: [mmacdougall@akingump.com](mailto:mmacdougall@akingump.com)  
[shmitchell@akingump.com](mailto:shmitchell@akingump.com)

/s/

Robert P. Trout (VA Bar # 13642)

*Counsel for Bijan Rafiekian*

Trout Cacheris & Solomon PLLC

1627 Eye Street, NW

Suite 1130

Washington, DC 20006

Telephone: (202) 464-3311

Fax: (202) 463-3319

E-mail: [rtrout@troutcahceris.com](mailto:rtrout@troutcahceris.com)

**CERTIFICATE OF SERVICE**

I hereby certify that, on the 4th day of March 2019, true and genuine copies of Defendant's Emergency Motion for Leave to Remove and Replace Exhibit A of the Memorandum in Support of His Motion to Compel and Proposed Order were sent via electronic mail by the Court's CM/ECF system to the following:

James P. Gillis  
John T. Gibbs  
Evan N. Turgeon  
U.S. Attorney's Office (Alexandria-NA)  
2100 Jamieson Avenue  
Alexandria, VA 22314  
Telephone: (703) 299-3700  
Email: [james.p.gillis@usdoj.gov](mailto:james.p.gillis@usdoj.gov)  
[john.gibbs@usdoj.gov](mailto:john.gibbs@usdoj.gov)  
[evan.turgeon@usdoj.gov](mailto:evan.turgeon@usdoj.gov)

\_\_\_\_\_  
/s/  
Robert P. Trout (VA Bar # 13642)